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Attorney for Defendant
LORETO MADRID

UNITED STATES DISTRICT COURT,

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LORETO MADRID

Defendant.

Court Case#: 1:22-cr-00281-ADA-BAM

**STIPULATION AND ORDER TO
MODIFY DEFENDANT'S TERMS OF
RELEASE.**

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Stephanie Stokman, and defendant, Loreto Madrid, by and through his counsel, Yan E. Shrayberman, hereby stipulate to modify Loreto Madrid's terms of pre-trial release to include drug counseling as a condition of pre-trial release.

Furthermore, parties hereby stipulation add additional following language to Mr. Madrid's pretrial release conditions:

"Participate in an Outpatient Substance Abuse Counseling- You shall participate in a program of medical or psychiatric treatment, including treatment for drug or alcohol dependency, as approved by the pretrial services

officer. You shall pay all or part of the costs of the counseling services based upon your ability to pay, as determined by the pretrial services officer.”

Accordingly, the parties respectfully request the Court adopt this proposed stipulation.

IT IS SO STIPULATED.

Dated: May 15, 2023

PHILLIP A. TALBERT
United States Attorney

By: /s/ Stephanie Stokman
STEPHANIE STOKMAN
Assistant United States Attorney

Dated: May 15, 2023

/s/ Yan E. Shrayberman
YAN E. SHRAYBERMAN
Attorney for Defendant
LORETO MADRID

Dated: May 15, 2023

/s/ Lorena Gallagher
LORENA GALLAGHER
U.S. Pretrial Services Office, EDCA

SO ORDERED

Dated: 5/25/2023

Sheila K. Oberto
United States Magistrate Judge